

REMARKS

Claims 1-43 are pending. Reconsideration of the claims in view of the following remarks is respectfully requested.

Entry of the Remarks is respectfully requested because entry of Remarks places the present application in condition for allowance, or in the alternative, better form for appeal. No new matters are believed to be added by these Remarks. Based on the above Amendments and the following Remarks, Applicants respectfully request that the Examiner reconsider the outstanding objections and rejections and they be withdrawn.

Rejections Under 35 U.S.C. §103

Claims 1, 8-15, 25-33, and 36-43 are rejected under 35 U.S.C. §103(a) for being unpatentable over U. S. Patent 5,548,506 issued to Srinivasan in view of U. S. Patent 6,223,177 issued to Tatham, *et al.* (hereinafter “Tatham”) and claims 2-7, 16-23 and 33-34 are rejected under 35 U.S.C. §103(a) for being unpatentable over Srinivasan in view of Tatham and further in view of “Workgroup automation tools for end users”, Software Review, hereinafter (“Workgroup”).

Applicants submit that neither Srinivasan nor Tatham discloses a workflow management system for automating a business process with the combination of features recited in claim 1 including an administrator that prepares for automating the business process, a process designer that creates and models flows and properties of the business process, a database that compiles information on the administrative steps and the properties of the business process, and a process engine that executes and handles the business process based on the information on the

administrative steps and the flows and the properties of the business process, as recited in claim 1.

Applicants also submit that Srinivasan and Tatham fail to disclose a method for automating a business process with the combination of features recited in claim 32, including the steps of modeling the business process, the step of modeling including generating an organization chart, designing the business process, compiling the business process in a database; executing the business process, and monitoring the business process, as recited in renumbered claim 32. As provided in the specification, Applicants' claims 1 and 32 provide a workflow management system for automating a business process, such as, for example, handling a purchase orders in the sales department, lending money in the banking industry, and paying insurance coverage by the insurance company (page 6, lines 6-9 of Applicants' specification).

Applicants respectfully submit that the invention disclosed in Srinivasan relates to the design and application of an **electronic network based project management server system for compiling, tracking and managing** multiple projects within an organization (col. 1, lines 33-39). In particular, Srinivasan discloses a system which receives project information, such as the project leader's name, mail identity and holidays, as well as, information about the tasks, such as the task duration or planned completion date, the dependencies for each task, and information about which resources and the amount of resources required (col. 5, lines 23-39). The system disclosed in Srinivasan then uses the information to help **manage the workflow for the projects**. Nowhere does Srinivasan disclose a system and/or a method for **automating a business process**, as recited in Applicants claims 1 and 32.

Further, with regards to claim 1, page 3 of the Office Action states that module 50 of Srinivasan acts as a process designer that creates and models the flow and the properties of the

business process. However, Applicants respectfully disagree because module 50 is a **project creation module which parses and reads in project data** for new projects (col. 4, lines 57-58). In particular, project creation module (50) **reads the project data for new projects and checks to see if the data is consistent with the data for other projects** (col. 5, lines 53-54). Thus, not only does Srinivasan fail to disclose a system or method for automating a business method, nowhere does Srinivasan disclose or suggest that the project creation module (50) **creates and models the flow and properties of the business process**, as recited in claim 1.

Further, with regards to dependent claim 2, the paragraph abridging pages 18 and 19 of the Office Action states that reference numeral 60 of Srinivasan discloses an **organization manager** where an organization encompasses entities, such as, a department. However, Applicants respectfully disagree because the reference numeral 60 of Srinivasan refers to managers and workers, that is, work-team members who communicate with the 'Auto Multi-Project Server' (Fig. 1, col. 4, lines 42-44 and col. 6, lines 64-67). In Srinivasan, program managers, project leaders and task leaders enter/communicate the information to the server, whereas Applicants' claim 1 **recites a system comprising an administrator and** Applicants' claim 2 recites that the system administrator comprises an organization manager.

In addition, page 5 of the Office Action admits that Srinivasan does not disclose an administrator, as recited in claim 1. The Office Action then states that Tatham overcomes this deficiency of Srinivasan. However, Applicants respectfully submit that Tatham discloses a system for providing a team of users with intranet-based groupware functionality (col. 3, lines 21-23). In particular, Fig. 3E of Tatham, which was referred to by the Examiner in the Office Action, shows an administration screen which provides a system administrator with access to different aspects of the system (col. 7, lines 53-54). Thus, Tatham discloses **a screen with**

information which may be used by an administrator, and Tatham does not disclose an administrator that prepares for automating the business process, as recited in claim 1, and thus, Tatham fails to overcome the deficiencies of Srinivasan, as discussed above.

Further, Applicants submit that there exists no motivation, other than impermissible hindsight reasoning, to combine the teachings of Srinivasan and Tatham. Tatham provides a computer which is configured as a web server (10) and has means to create a unique resource locator (URL) address and means to create a dedicated intranet site (25) on the server in response to a request from a primary user (col. 3, lines 28-38). The URL address to a secondary user who may then communicate with the server (10) by means of an HTML compliant client supporting a GUI and internet browser, such as Netscape Navigator (col. 3, lines 39-42). When the primary and/or secondary user is connected to the designated site (25), both users have access to at least some of the information contained stored at the site.

Applicants respectfully submit that one of ordinary skill in the art at the time of Applicants' invention would not have been motivated to combine the teachings of Srinivasan, which relates to the design and application of an electronic network based project management server system for compiling, tracking and managing multiple projects within an organization, with the teachings of Tatham to disclose Applicants' claimed invention. MPEP §2143.01 states that "Obviousness can only be established by combining or modifying the teachings of the prior art to produce the claimed invention where there is some teaching, suggestion, or motivation to do so found either explicitly or implicitly in the references themselves or in the knowledge generally available to one of ordinary skill in the art."

For at least these reasons, Applicants respectfully submit that nowhere does Tatham disclose or suggest a system and/or a method for automating a business process as recited in

Applicants' claims 1-42, and fails to overcome the deficiencies of Srinivasan with respect to the features of Applicants' claims 1-42.

Finally, Applicants submit that Workflow also fails to overcome the deficiencies of Srinivasan and Tatham with regard to Applicants' claims 1-42 because Workflow is a workflow management package for workgroups that allows decentralized coordination of collaborative projects and, in particular, includes a tool set that helps users dynamically organize, locate, share and process individual information elements. More particularly, Workflow discloses a system which helps organize, locate, share and process individual information elements (page 1, lines 23-24).

For at least these reasons, Applicants submit that Srinivasan, Tatham and Workgroup, either alone or in combination, fail to disclose or suggest all the features recited in Applicants' independent claims 1 and 32, as well as all the features of claims 2-31 and 33-43, which depend from claims 1 and 32, respectively. Thus, Srinivasan, Tatham and Workgroup fail to render obvious the subject matter of claims 1-43. It is respectfully requested that the rejections over claims as 1-43 be withdrawn.

CONCLUSION

All of the stated grounds of objection and rejection have been properly traversed, accommodated, or rendered moot. Applicants therefore respectfully request that the Examiner reconsider all presently outstanding objections and rejections and that they be withdrawn. Applicants believe that a full and complete response has been made to the outstanding Office Action and, as such, all pending claims are in condition for allowance. If the Examiner believes, for any reason, that personal communication will expedite prosecution of this application, the Examiner is invited to telephone the undersigned at the number provided.

Prompt and favorable consideration of this Amendment is respectfully requested.

Respectfully submitted,



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